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February 28, 2001

Mr. John P. Kos, P.E.
District Engineer
Illinois Department of Transportation
201 W. Center Court
Schaumburg, Illinois 60196

RE: Draft Supplemental Final EIS for I-355 South

Dear Mr. Kos:

Our concerns about the Draft Supplemental Final EIS for I-355 South fall into four categories:

- The lack of meaningful public involvement;
- the failure to conduct an analysis of air quality impacts;
- the failure to conduct a meaningful analysis of alternatives; and
- disregard for NEPA case law.

6.2 The Illinois Department of Transportation consistently refused to hold open public meetings during the two years it spent revising the draft, especially in the early phases. In attempting to create a perception of public involvement, IDOT did hold meetings that were attended exclusively by members of the Southern Alliance For the Extension (SAFE). Their input is just as valid as the input of extension critics, but you may not use it as evidence of adequate public involvement. IDOT is obligated by federal law to hear and consider all points of view. We understand that public access even to the Draft Supplemental Final EIS has been limited to CD-ROM format or belated availability at some libraries. The CD-ROM was not made available until some weeks after the public comment period. This abuse of public involvement and notification procedures is unconscionable.

4.2 The failure to calculate the differential effects of auto emissions on air quality, under different alternatives, is equally disturbing. The impact of this extension on regional air quality should be thoroughly analyzed. One is forced to ask what was under study during the last two years, if essential questions like this have gone unanswered.

3.6 The alternatives analysis is deficient in several significant respects. From the statement of purpose to the definition of need to the selection of regional goals and objectives addressed, the scope is severely limited. When only a subsection of needs, goals, and purposes is examined, it becomes easier to draw limited (and potentially faulty) conclusions. An adequate analysis may have presented different outcomes and alternatives.



STRATEGIES FOR LIVABLE COMMUNITIES

1000 North Dearborn Street, Suite 200, Chicago, IL 60610

February 28, 2001

Mr. John P. Kos, P.E.
District Engineer
Illinois Department of Transportation
201 West Center Court
Schaumburg, Illinois 60196

Re: Draft Supplemental Final Environmental Impact Statement
For FAP Route 340 (I-355 South Extension)

Dear Mr. Kos:

Openlands Project is a non-profit organization that has been dedicated to preserving and enhancing public open space since our formation in 1963. We appreciate the opportunity to comment on the December 2000 Draft Supplemental Final Environmental Impact Statement (DSFEIS) for FAP Route 340 (the I-355 South Extension).

The DSFEIS makes great strides over the analysis presented in the 1996 Final Environmental Impact Statement (FEIS). However, the DSFEIS still leaves a number of important questions unanswered. Because of these deficiencies, it is impossible to reach any meaningful conclusion about what the best alternative is. At a minimum, these informational and analytical gaps cast grave doubt on the choice of the Tollroad / Freeway Alternative.

I. Generally

A. Failure to Consider All Reasonable Alternatives

3.3 The DSFEIS entirely ignores the "Action Plan" prepared by Lincolnway South Corridor Against the Tollway, Business and Professional People for the Public Interest, the Environmental Law and Policy Center, and New Alternatives, Inc. These groups presented the Action Plan to the Illinois Department of Transportation (IDOT) in July 2000, approximately six months before the DSFEIS was released.

The Action Plan outlines a number of north-south and east-west improvements, many of which have already received funding, that offer transportation improvements far in excess of those offered by the Enhanced Arterial Alternative, and may have less environmental impact than the Tollroad / Freeway Alternative. However, the DSFEIS does not even consider the Action Plan, despite the fact that many of its proposed improvements have already been funded to some degree or are in existing highway planning documents.

B. Failure to Evaluate the Environmental Impacts of the Alternatives

3.6 Regulations implementing the National Environmental Policy Act specifically state that an Environmental Impact Statement "should present the environmental

NEPA requirements seem to have been overlooked. NEPA prohibits defining purpose and need in such a limited scope that only a limited range of solutions will suffice. NEPA requires a comparison of the impacts of various alternatives, which is missing from this document. Because there is no Action Plan, or a similar alternative, in the Draft Supplemental Final EIS it is impossible to determine whether "all reasonable alternatives" have been considered.

It is a disservice to the public and the Illinois General Assembly that IDOT and the Illinois State Toll Highway Authority continue to try to build a road for which there is no logic and no funding. We assume that if there is a credible case to be made for this road it would be presented in the Draft Supplemental Final EIS. The failure to make an adequate case after all the resources devoted to this endeavor is telling.

Sincerely,

Jacquelyne D. Grimshaw

Jacquelyne D. Grimshaw, Coordinator
Transportation and Air Quality Division

Page 3 of 5

impacts of the proposal and the alternatives in comparative form" and "devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits." 40 C.F.R. § 1502.14 (emphasis added).

3.8 Despite this clear directive, Chapter 4 ("Environmental Consequences") of both the DSFEIS and FEIS consider the environmental impacts of only one alternative: the Tollroad / Freeway Alternative. The documents ignore the environmental impacts of the Enhanced Arterial Alternative, the Lemont Bypass Alternative, the Mass Transit Alternative, and the Action Plan.

The purpose of an Environmental Impact Statement is to present the full range of costs and benefits of all reasonable alternatives. Decision-makers and the public cannot make a meaningful comparison of alternatives when the environmental costs and benefits for the alternatives (except one) are omitted. For example, the Enhanced Arterial Alternative and the Mass Transit Alternative might turn out to have much lower environmental impacts (by avoiding the need for a new bridge over the Des Plaines River valley) than the Tollroad / Freeway Alternative. A reasonable decision-maker might wish to (indeed, is required by law) weigh the trade-offs in transportation improvements and environmental effects among those three alternatives, but that is impossible when the environmental effects of most of the alternatives are entirely absent from the discussion.

Because this omission prevents any meaningful comparison of alternatives, Openlands has serious doubts that the Tollroad / Freeway alternative, or any other alternative, can be labeled "recommended" at this point.

II. Specific Comments

A. Chapter 3 "Alternatives"

7.1 In its "Performance Analysis," the DSFEIS uses criteria that entirely miss two important factors: they give no weight to environmental protection, and they also fail to consider economic viability. The purpose of an Environmental Impact Statement is to weigh the costs and benefits of all reasonable alternatives, yet the chosen criteria ignore fiscal costs and environmental costs. Given uncertainty about funding for the Tollroad / Freeway Alternative, and given the widely varying environmental effects of the alternatives, such an omission makes it impossible to compare the alternatives fairly.

B. Chapter 4 "Environmental Consequences"

1. Section 4.10 "Water Quality and Water Resources"

a. Section 4.10.2 "Impacts to Surface Waters"

4.7 The DSFEIS and FEIS raise many questions about how the roadway will affect surface waters and what steps will be taken to mitigate those effects.

The DSFEIS fails to clarify the discussion of "Construction Impacts to Surface Waters" in Section 4.10.2. When discussing how to minimize environmental impacts on the Des Plaines River Valley, Spring Creek, Fraction Run, and Fiddym Creek, the FEIS repeatedly says that "erosion control measures" will be used. Which erosion control measures will be used at which sites? The current description is too vague to determine whether the measures will be effective.